

# **Exhibit A**

# COMMERZBANK



NEW YORK BRANCH

Department of the Treasury  
Office of Foreign Assets Control  
1500 Pennsylvania Avenue NW  
Washington DC 20220

Vinay Jepal  
2 World Financial Center, New York, NY 10281-1050  
Telephone (212) 266-7200  
Fax (212) 266-7235  
[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

## Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Cuidad Ojeda, Estado Zuila, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller

Board of Managing Directors: Martin Blessing (Chairman),

Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,

Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main

Registered Office: Frankfurt am Main Reg.No. 32000

VAT No. DE 114 103 514

# COMMERZBANK



NEW YORK BRANCH

## Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch

Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance

Vinay Jepal  
Sanctions Compliance Officer

Encls.

stratus int'l payment

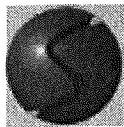
:LT Address :COBAUS3XA  
:transaction type :202 COVER bank tfr favour 3rd bank  
:input from :COBADEFF  
COMMERZBANK AG FRANKFURT  
HEAD OFFICE  
32-36 NEUE MAINZERSTRASSE  
60261 FRANKFURT GERMANY  
:validation Flag :COV}

---

{4: Text block:  
:20 /transaction reference number :FAAS109400150500  
:21 /related reference :FAAS109400150500  
:32A/value date :040411 USD 29,442,967.57  
:52A/ordering institution - BIC :COBADEFF  
COMMERZBANK AG  
FRANKFURT AM MAIN  
:57A/account with inst - BIC :CHASUS33  
JPMORGAN CHASE BANK, N.A.  
NEW YORK, NY  
:58A/beneficiary inst - BIC :SHHBCHZZ  
HYPOSWISS PRIVATBANK AG, ZURICH  
ZURICH  
:50K/ordering customer :/400887746602USD  
BT/ FIDEICOMISO / FONDO CHINO  
VENEZOLANO. AV GUICAIPURO. URB EL  
ROSAL. TORRE BANCO DEL TESORO.  
CARACAS - VENEZUELA.  
:52A/ordering institution - BIC :BDTEVECA  
BANCO DEL TESORO, C.A. BANCO  
UNIVERSAL  
CARACAS  
:59 /beneficiary customer :/CH7708530519663100203  
STRATUS INTERNATIONAL CONTRACTING  
J.S.  
:70 /details of payment :REF: DESEMBOLSO NRO. 386 FONDO  
CHINO VENEZOLANO. CODIGO NRO.  
00579.  
:33B/amount :USD 29,442,967.57}

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Entry : /SWIFT/ Date:110404 Time:02:44:17  
Info:1111/001781



*Stratus International  
Contracting Company*

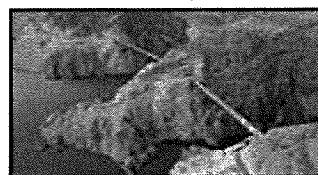
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.  
STRATUS is Graded in three major categories: [Read more...](#)
  
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)
  
- Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran - UK Chamber of Commerce
  - Iran - Canada Chamber of Commerce [Read more...](#)

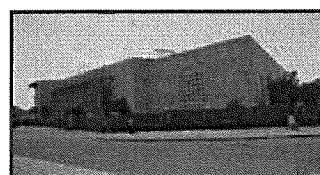
*Road & Railway*

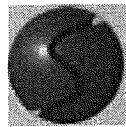


*Dam*



*Building*

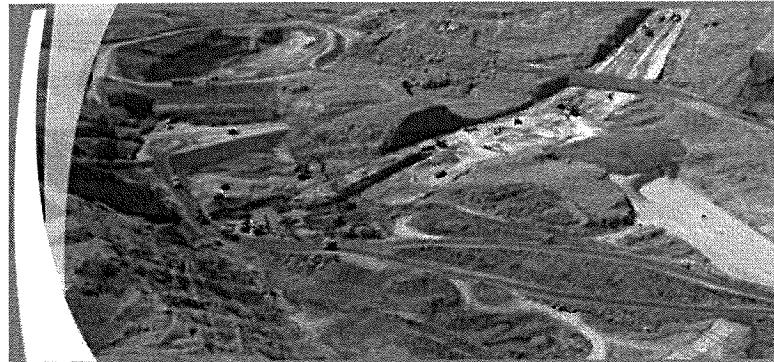




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Contracting Company

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Contact Us

**STRATUS International Contracting Co.**

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

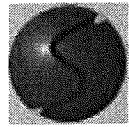
Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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**Stratus International**

Contracting Company

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**Branch Offices**

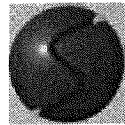
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**Middle East**  
Iran  
Iraq**CIS**  
Kazakhstan**South America**  
Venezuela

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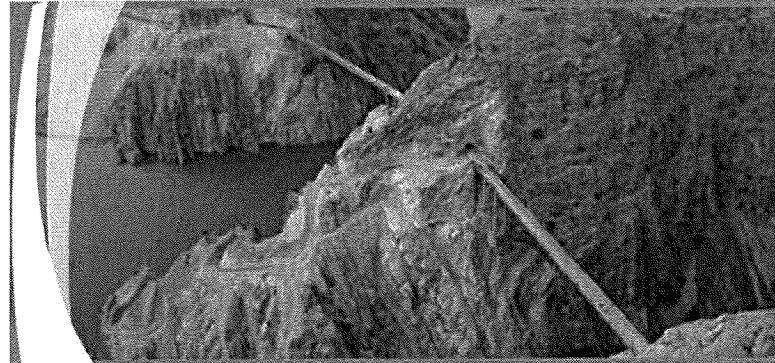
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#### Sister Companies List



1. Samaneh Stratus (INVESTMENT CO.)



2. Iran Construction Investment Co.



3. Eghtesad - Novin Bank

4. Pishgaman Bazar Novin (BROKERAGE CO.)



5. Novin Insurance Co.



6. Pars Shahr Co.



7. Global Petro Tech CO.



8. Keyhan Tabadol Co.



9. Pars Hanza Aluminium CO.



10. Azarbajian Industry Development Co.

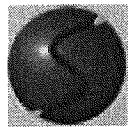
11. Eghtesad Novin Investment CO.



12. Samaneh Gostar Novin

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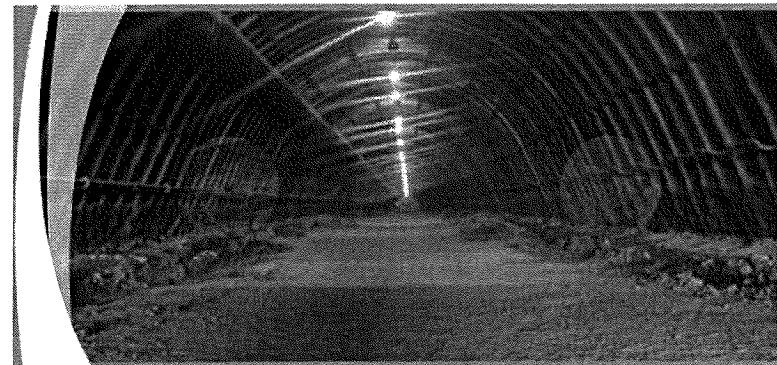
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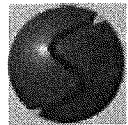


## 7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m <sup>3</sup> Net Construction Area : 850.000 m <sup>2</sup> Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A'
Contract Duration	48 Months
Date of Award	September 2009
Status	[ Under Construction ]



[\[Back to list\]](#)



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**Dalbandin – Nokkundi Highway - Section III-B**

[Details >>](#)



**Socotra Airport**

[Details >>](#)



**Design & Construction of Parliament Building & Commercial Center in Djibouti City**

[Details >>](#)



**7000 Units "New Ojeda" Housing Development Project**

[Details >>](#)

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T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

(KADIKÖY)  
370857 - 2010

SİCİL TASDIK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahsin mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN  
İSTANBUL TİCARET SİCİLİ  
MƏMURU YARDIMCISI

